

**Table 2: Annual Respondent Burden and Cost Of Reporting And Recordkeeping Requirements  
Of The Standards For Batch Vapor And In-Line Cleaning Machines**

Activity	(A) Person hours per Occurrence	(B) Number of Occurrences per respondent per year	(C) Person hours per respondent per year <sup>a</sup> C = A * B	(D) Respondents per year <sup>b</sup>	(E) Total Hours Per Year E = C * D	(F) Total Cost Per year
<b>1. Applications</b>	Not Applicable					
<b>2. Surveys and Studies</b>	Not Applicable					
<b>3. Reporting Requirements</b>						
A. <u>Read Instructions</u>	2.00	1.00	2.00	393 d	786.00	\$31,259.22
B. Gather Existing Information	included in 3.C					
C. Write Report						
Initial Notification Report	1.00	1.00	1.00	393 d	393.00	\$15,629.61
Initial Compliance Report	4.00	1.00	4.00	393 d	1,572.00	\$62,518.44
-- Performance Test Results	30.00	1.00	30 e	39 f	1,170.00	\$46,530.90
Annual Compliance Report	1.50	1.00	1.50	1,180.00	1,770.00	\$70,329.90
Exceedance Report (with Exceedance)	1.00	3 g	3.00	118 h	354.00	\$14,078.58
Exceedance Report (no Exceedance)	0.50	1 g	0.50	1062 h	531.00	\$21,117.87
<b>4. Recordkeeping Requirements</b>						
A. Read Instructions	Included in 3.A					
B. Plan Activities	1.00	1.00	1.00	393 d	393.00	\$15,629.61
C. Implement Activities						
Performance Test	50.00	1.00	50.00	39 f	1,950.00	\$77,551.50
Control Device Monitoring	1.64 j	12.00	19.68	590 k	11,611.00	\$461,769.47
Solvent Consumption Log	1.50	12.00	18.00	590 i	10,620.00	\$422,357.40
D. Record Data						
Control Device Monitoring Records	1.2 m	12.00	14.40	590 k	8,496.00	\$337,885.92
Solvent Emission Calculation	0.75	12.00	9.00	590 i	5,310.00	\$211,178.70

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E. Time to Train Personnel	Not applicable					
<b>SUBTOTAL</b> (labor cost only)					44,956.00	\$1,787,900.10
5. Capital/Start-up Cost (Annualized) <sup>1</sup>						\$3,078,620.00
6. O & M Cost <sup>2</sup>						\$1,012,440.00
<b>TOTAL ANNUAL BURDEN</b>						\$5,704,538.02

- a All tasks are assumed to be performed by a technical person \$18.94 + 110% overhead = \$39.77.
- b Total number of facilities estimated as: 3,069 cleaning machines/2.6 cleaning machines per facility = 1180 facilities. One-time costs were averaged over three years. 1180 facilities /3 years = 393 facilities/year.
- c Costs were calculated by multiplying the total number of hours by the hourly wages noted in footnotes a and e for column (C).
- d One-time costs were estimated based on 1180 facilities averaged over 3 years: 1180/3 years = 393 facilities/year.
- e Idling emission or dwell test and report are estimated to require 70 technical hours and 10 managerial hours total (or 87.5% @\$39.77/hr + 12.5% @\$56.63/hr = \$41.86/hr average hourly rate). The hours were divided between the test itself (50 hours) and the test report (30 hours).
- f Assumed that 50% of the facilities will choose the equipment standard; 20% of those will conduct one-time idling test; and one-time cost is averaged over 3 years: 50% x 1180 facilities x 20% / 3 years = 39 facilities.
- g Burden of one quarterly and one semiannual exceedance report was included in the burden estimate for the annual report.
- h Assumed that 10% of the facilities are in exceedance one time per year: 10% x 1180 facilities = 118 facilities.
- i Activities planning is assumed to be performed by a manager (\$56.63/hr).
- j Actual monitoring is conducted weekly, monthly or quarterly for specified control devices. This estimate includes weekly, monthly, and quarterly times based on the typical control devices expected to be installed.
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- k Assumed that 50% of the facilities will choose the equipment standard and will be required to conduct control device monitoring:  $50\% \times 1180 \text{ facilities} = 590 \text{ facilities}$ .
- l Assumed that 50% of the facilities will choose to do solvent consumption monitoring:  $50\% \times 1180 \text{ facilities} = 590 \text{ facilities}$ .
- m Assumed to require 20 minutes per cleaning machine, 2.6 machines per facility, and 20 minutes for overall recordkeeping:  $[(0.33 \text{ hrs/cleaner})(2.6 \text{ cleaners/facility})] + 0.33 \text{ hrs/facility} = 1.2 \text{ hrs/facility}$ .
- n This includes calculations of monthly emissions and a 3-month rolling average emissions from solvent data
- o Assumed to be included in facilities' regular training (no special training required)
- p Assumes 100% of facilities purchase equipment to comply with Standard ( $\$2,609 \text{ annualized cost/year} \times 1180 \text{ facilities} = \$3,078,620/\text{year}$ ).